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1. Article Addressed to: **APR 08 2016** *A.*

Mr. Fred von Ahrens
 Manufacturing Director
 FMC Corporation
 580 Westvaco Rd., P.O. Box 872
 Green River, WY 82935

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2. Article Number **7008 3230 0003 0728 8669**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8ENF-AT

APR 07 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred von Ahrens, Manufacturing Director
FMC Corporation
P.O. Box 872
580 Westvaco Road
Green River, Wyoming 82935

Re: Follow-up to Section 114(a) Information Request for the FMC Corporation Granger Facility
in Wyoming; Capital Projects Identified

Dear Mr. von Ahrens:

The EPA has reviewed the information provided by FMC Corporation (FMC) with respect to the Granger Soda Ash facility (Granger) in response to the EPA's April 28, 2014 Request for Information (April 2014 Request) under section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Pursuant to the authority under section 114 of the CAA, the EPA is seeking additional information so that a determination can be made as to whether the Granger facility has been, and is, complying with the CAA's requirements regarding work performed on emission units at the facility.

The enclosed Request for Information contains questions to clarify the information FMC provided in response to the April 2014 Request. A narrowed list of capital projects and clarification questions are provided in Enclosure 1 to this letter. Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official.

This Request for Information is a supplement to the April 2014 Request and is also made pursuant to section 114(a) of the Act, 42 U.S.C. § 7414(a). This Request for Information incorporates the applicable instructions, definitions, and requirements of the April 2014 Request. Please refer to the April 2014 Request at Enclosure 2 for applicable instructions, definitions, certification requirements, and business confidentiality claim assertion and substantiation requirements. FMC's response to this Request for Information is due within **thirty (30) days** of its receipt of this letter.

Failure to provide the required information is a violation of the CAA and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this Request for Information; 3)

cc: Nancy Vehr, Wyoming Department of Environmental Quality
Jessica Portmess, R8ENF-L
Joe Wilwerding, R8ENF-AT
Greg Fried, EPA-Headquarters

ENCLOSURE 1 – MAY CONTAIN CONFIDENTIAL BUSINESS INFORMATION

INFORMATION REQUESTED:

1. The EPA has reviewed the list of capital projects provided by FMC with respect to the Granger facility in response to the April 28, 2014 Request for Information, and has identified a narrowed list of projects for which the EPA requests supplemental information. For each of the capital projects listed in the following table, please provide:
 - a. The documents requested in question 6 of the April 2014 Request;
 - b. All documents requested in question 7 of the April 2014 Request.

Project Number	Unit	Project Description
IWT001GRA014	2	Replace #2 boiler economizer.
IWT051GRA004	1	Purchase and install a new economizer.
IWT061GRA008	2	Purchase and install a new economizer for #2 coal boiler.
IWT070GRA001	1	Rebuild the stoker rotograte.
IWT070GRA004	2	Rebuild the stoker rotograte.
IWT121GRA005	Both	Replace the fixed speed mechanical governor with improved control and electro-hydraulic actuator.
N/A	2	#2 ID Fan base repair and rotor replacement.

2. Provide an update to FMC's responses to questions 4 through 11 of the April 2014 Request for the period July 31, 2014 to present.
3. Provide a process and block flow diagram for the current FMC Granger facility configuration, and a diagram for each facility configuration used between 1995 and 2015, indicating the time period to which the configuration applies. Include the coal-fired boilers and process operations served by the boilers on each diagram.
4. Based on FMC's responses with respect to the Granger facility, it is unclear whether the trona ore calciners have been active since 2007, or if FMC has plans for future calciner operations at the Granger facility. If the calciners were active after 2007, or are planned to be active in the future, provide for the calciners:
 - a. Summary reports from all stack tests for PM, SO₂, NO_x, CO, and VOC performed since 1995, showing test results and the operation conditions recorded during the test; and
 - b. The information requested under questions 2 and 4-11 of the April 2014 Request.

ENCLOSURE 2

APRIL 28, 2014 INFORMATION REQUEST



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

APR 28 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred von Ahrens, Manufacturing Director
FMC Corporation
P.O. Box 872
580 Westvaco Road
Green River, WY 82935

Re: Section 114(a) Information Request for FMC Corporation Facilities in Wyoming

Dear Mr. von Ahrens:

The United States Environmental Protection Agency (EPA) hereby requires FMC Corporation (FMC or you) to provide certain information to determine the Clean Air Act (CAA) compliance status of the Westvaco Facility and the Granger Facility that you own or operate approximately 20 and 30 miles west respectively of Green River, Wyoming.

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. For the EPA to determine whether a violation of the CAA has occurred, you are hereby required, pursuant to section 114 of the CAA, to provide responses to the following request for information regarding the facilities listed above. Accordingly, within thirty (30) calendar days from receipt of this request, you must respond to this request. Instructions and definitions are provided in Enclosure 1 and the information being requested is contained in Enclosure 2.

You are required to attach a properly executed Statement of Certification (Enclosure 3) to your response to this request. The statement must be signed and dated. This statement certifies that the response submitted to the EPA is true, correct, accurate, and complete; and that the response contains all documents and information responsive to this request that are known to you, following a complete and thorough review of all information and sources available to you.

If you have any questions regarding this information request, please contact Hans Buenning, at 303-312-6486, or your counsel may contact David Rochlin, at 303-312-6892.

Sincerely,



Eddie A. Sierra
Acting Assistant Regional Administrator
Office of Enforcement, Compliance and
Environmental Justice

Enclosures: 1) Instructions and Definitions
2) Information Requested
3) Statement of Certification
4) Confidential Business Information

cc: Steven A. Dietrich, Wyoming Department of Environmental Quality
David Rochlin, EPA- Region 8
Hans Buenning, EPA-Region 8
Greg Fried, EPA Headquarters, Air Enforcement Division

5. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by the EPA, with all necessary documentation and support. All documents should also include all attachments to or enclosures for the document provided.
6. "EPA" shall mean the United States Environmental Protection Agency.
7. The term "mmBTU" shall mean million British Thermal Units.
8. The term "PSD" and the term "NSR" shall mean the Prevention of Significant Deterioration and the New Source Review preconstruction permitting programs established at CAA subparts C and D and further defined at 40 C.F.R. Parts 51 and 52 and any respective program established under an EPA-approved state implementation plan.
9. The term "project" shall have the same meaning as defined at 40 C.F.R. § 52.21(b)(52) and § 51.166(b)(51).
10. The term "spill temperature" shall mean the temperature reading taken at the outlet of the calciner where the calcined material is discharged from the calciner drum.

- h) type of nitrogen oxides emission controls and year installed with description of any performance improvements beyond the original design made to the control device since the original installation, and
 - i) any anticipated emission controls and estimated dates of installation.
- 4. Provide a list identifying all capital projects that have been performed on each calciner and coal-fired boiler since January 1, 1995. The list shall include, but is not limited to, the following information:
 - a) the work order number,
 - b) project description,
 - c) list of equipment purchased and installed,
 - d) authorized or projected expenditure,
 - e) actual expenditure,
 - f) date of approval,
 - g) project completion date,
 - h) in-service date, and
 - i) each original equipment manufacturer (OEM), equipment suppliers, or contractors that provided engineering, fabrication, and/or installation services for the project.
- 5. For the capital projects identified in Request No. 4 pertaining to calciners, provide copies of all capital improvement project requests with authorized expenditures, authorizing signatures, and approval dates, with all attachments and supporting documents.
- 6. After EPA has received the list of projects identified in Request No. 4, the EPA will narrow the list and send it to FMC. FMC must thereafter provide the documents in (a) through (h) below, as applicable, for those projects on the narrowed list within thirty (30) calendar days of its receipt of the narrowed list:
 - a) all capital improvement project requests with authorized expenditures, authorizing signatures, and approval dates, with all attachments and supporting documents (unless already provided under Request No. 5),
 - b) copies of all permits, applicability determinations, and non-applicability determinations, along with supporting information related to each project. Relevant documents include, but are not limited to: permit applications, correspondence, memoranda, telephone discussion summaries, and communications with state and/or federal agencies related to applicability of the federal SIP-approved PSD/NSR program, SIP-approved minor source construction permitting program, and 40 C.F.R. Part 60, New Source Performance Standards,
 - c) project justifications,
 - d) cost/benefit analyses,
 - e) all alternative options analyses,

- following as available: % trona, % alkalinity, % insolubles, % water, % NaCl, % SiO₂, and % TOC, and
- h) monthly emissions data (in lb/ton and tons/month) for each calciner. For pollutants measured by a continuous emissions monitoring systems (CEMS), provide the monthly CEMS data for those months where a CEMS was in use. For those pollutants not measured by a CEMS, provide the emission values reported to the Wyoming Department of Environmental Quality with an explanation of how the emissions were estimated.
11. Provide the following information in electronic format (Excel or other comma delimited format) for each coal-fired boiler 1995 to the present:
- a) operating hours on a monthly basis,
 - b) coal consumption (tons) on a monthly basis,
 - c) total heat input (mmBTU) on a monthly basis,
 - d) monthly emissions data (in lb/mmBtu and tons/month) for pollutants measured by a CEMS, and
 - e) summary results of all stack tests for PM, PM₁₀ and PM_{2.5}.

ENCLOSURE 4

Confidential Business Information (CBI) Assertion and Substantiation Requirements

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414, and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." See 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business's competitive position. See 40 C.F.R. § 2.208 (a)-(d). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

David Rochlin
U.S. EPA Region 8
1595 Wynkoop Street (ENF-L)
Denver, CO 80202-1129
(303) 312-6892

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

ENCLOSURE 3

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Printed Name)

(Title)

(Date)